

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 12-20663-CR-ZLOCH(s)(s)

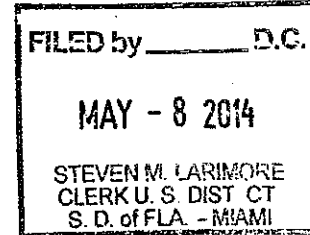
18 U.S.C. § 1956(h)

18 U.S.C. § 982(a)(1)

UNITED STATES OF AMERICA

vs.

JORGE EMILIO PEREZ DE MORALES SANTE
and
EDUARDO PEREZ DE MORALES,
Defendants.



SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

**CONSPIRACY TO COMMIT MONEY LAUNDERING
(18 U.S.C. § 1956(h))**

From in or around October 2005 and continuing through in or around March 2011, in Miami-Dade County and Broward County, in the Southern District of Florida, and elsewhere, the defendants,

**JORGE EMILIO PEREZ DE MORALES SANTE
and EDUARDO PEREZ DE MORALES,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with Oscar Sanchez, Felipe Ruiz, Kirian Vega, and other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (a)(2)(B)(i), and 1957, that is:

(a) to knowingly conduct a financial transaction affecting interstate and foreign commerce, which financial transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity; in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

(c) to knowingly engage in a monetary transaction affecting interstate and foreign commerce, by, through, and to a financial institution, in criminally derived property of a value greater than \$10,000, and such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Sections 1347 and 1349.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE
(18 U.S.C. § 982(a)(1))

1. The allegations in this Second Superseding Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which each of the defendants, **JORGE EMILIO PEREZ DE MORALES SANTE** and **EDUARDO PEREZ DE MORALES**, have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Second Superseding Indictment, each of the defendants shall forfeit to the United States all right, title and interest in any property, real or personal, involved in such violation, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. The property which is subject to forfeiture includes, but is not limited to, approximately \$238,067,956 in United States currency, which sum represents the value of property involved in the charged offense, or any property traceable to such property.

4. If the property described above as being subject to forfeiture, as a result of any act or omission of any of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of each of the defendants, up to the value of the above forfeitable property, and in addition, to require the defendant to return any such property to the jurisdiction of the court for seizure and forfeiture. Said property includes, but is not limited to, the following:

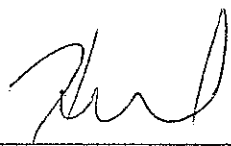
- (a) real property located at 4290 SW 2nd Terrace, Miami, Florida, and
- (b) real property located at 3040 SW 128 Avenue, Miami, Florida.

All pursuant to Title 18, United States Code, Section 982(a)(1), and the procedures set forth at Title 21, United States Code, Section 853.

A TRUE BILL,

FOREPERSON


WIFREDO A. FERRER
UNITED STATES ATTORNEY


H. RON DAVIDSON
ASSISTANT UNITED STATES ATTORNEY